Petaluma Farms, Petaluma Poultry and Willowbrook Feed
Comment to the National Organic Standards Board
Buena Park, California
March 6, 2001

Good Morning,

My name is Steve Mahrt. I have been raising organic egg laying hens on our family farm, Petaluma Farms, for the past five years and raising uncaged laying hens without antibiotics or animal by-products for 17 years before that.

After I read the TAP review of DL Methionine provided by OMRI , I feel compelled to provide this board with information that was perhaps not available during the formal review process. I also realize that this review will not be addressed at this meeting, but that you have been charged with the difficult task of understanding the many complex issues surrounding livestock production. Because it **IS** so complex, I would like to offer a quick overview of **WHY** Methionine is essential to a well-run organic poultry farm so when the issue **DOES** come up, you can make an informed decision.

The issue begins with the ability of organically raised poultry to freely go outdoors. Weather, particularly harsh weather like snow, rain, wind, heat and cold, as well as the age of the bird, contribute to whether or not it's desirable or wise for the birds to be outside. Birds need the heat and shelter of housing to protect them. Older, (and smarter) birds just don't **like** going outside in unfavorable weather. Across the country you will find that about **two thirds** of the time, it is best for the birds' well being to remain indoors. **One third** of a bird's life must be spent indoors because they are either too young and lack enough protection from undeveloped feathers and another **third** of the time, the weather is just not comfortable enough for the birds to be outdoors. It was mentioned that range could provide sufficient nutrients to maintain an optimal state of health and wellness which may be true for poultry that is not being raised for production. This presents a problem. How do I properly care for

the birds to ensure that their nutrient requirements are met and that they are not prone to deficiencies that will invite a host of diseases?

Originally, the ancestors of today's laying hen had the primary job of producing chicks to replace those birds that died. Mortality rates were high and eggs served as means of reproducing the species. Over time, we have been able to increase the number of eggs so that we now can use them as food for ourselves. One hundred years ago only 1 in 10 birds would live to full maturity. Today the survival rate is 9 out of 10. To be commercially viable today, I have to make **sure** that I do not lose more than one bird out of ten.

Forty years ago we fed birds based on their crude protein requirements. Now we've learned precisely what the birds require at each stage of their life so we can supplement their diet of grains with individual amino acids **in proper balance** to prevent the birds from becoming stressed as a result of an improperly balanced diet. Symptoms of improper balance in a bird's diet are poor feathering, immune system suppression and fatty livers, just to name a few. It is practically impossible to formulate a properly balanced diet using commercially available organic feed stocks alone.

OMRI's TAP review mentions earthworms as a source of Methionine. Earthworms bring a host of their own problems that outweigh their advantage as a Methionine supplement. The review refers to studies done with earthworm meal, very different than fresh earthworms, which have such high moisture content that a bird cannot consume enough earthworms to get the adequate amount of nutrients from them. Earthworm meal is a possibility, but the amount of energy to dry sufficient quantities to produce enough Methionine would be cost prohibitive and wasteful. Another risk of using earthworms is their susceptibility to a deadly disease known as "Blackhead", a parasite that will kill the birds.

What we're after is not to decrease the amount of protein in the bird's diet by supplementing their feed with Methionine. We're balancing the protein to match the bird's needs for production and good health. All the certifiers I am familiar with allow Methionine for that reason. The proper use of Methionine provides a method for family farmers raising organic poultry to be more sustainable in the way they raise birds. Without Methionine my feeding system would use much more protein than is really necessary. The excess protein is

converted to energy and in that process, nitrogen is excreted as uric acid, which quickly converts into ammonia, which is a serious air pollutant.

True sustainability means efficient resource usage. One pound of Methionine saves 125 pounds of feed. If organic egg producers attempted to balance their ration using grain, soybean meal and other available protein sources, we would be wasting 22,500 pounds of corn and soybeans every day to feed approximately 750,000 organic laying hens in the US. Instead, we would use only 180 pounds of Methionine.

Our organic system should not allow this kind of waste. It should not allow pollution of the air from excess nitrogen excreted as ammonia and it should **absolutely not allow our livestock's health and wellness to be compromised.** I hope you will give serious consideration to my thoughts presented here today. Thank you for your time and for your attention.

Steve Mahrt

Petaluma Farms